

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

CXE 19-025213  
LOGS Legal Group LLP  
14000 Commerce Parkway, Suite B  
Mount Laurel, NJ 08054  
(856) 793-3080  
Elizabeth L. Wassall, Esq. 023211995  
ATTORNEYS FOR NATIONSTAR MORTGAGE LLC  
D/B/A MR. COOPER

In Re:

JOHN CHISHOLM,  
DEBTOR

Case No.: 19-12782-MBK

Judge: HONORABLE MICHAEL B.  
KAPLAN

Chapter: 13

### **NOTICE OF RESPONSE TO MOTION TO SELL**

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, Nationstar Mortgage LLC d/b/a Mr. Cooper, the holder of a Mortgage on Debtor's property commonly known as 738 Gail Drive, Neptune, New Jersey 07753, hereby objects to Debtor's Motion to Sell Real Property on limited grounds:

1) On October 8, 2021, counsel for the Debtor(s) filed the instant motion seeking an Order Authorizing Sale of Real Property commonly known as 738 Gail Drive, Neptune, NJ 07753. See ECF Doc.:50.

2) Creditor is not opposed to the basic principle of the Debtor(s) selling the property; provided that any Order entered by the Court clearly specifies that such sale is contingent upon Nationstar Mortgage LLC d/b/a Mr. Cooper's lien being fully paid off and satisfied through this transaction.

3) Creditor estimates the total amount to satisfy this lien thru October 25, 2021 to be \$92,786.73. In the event an Order authorizing sale is entered by the Court, Creditor will provide an updated and accurate payoff statement to coincide with a scheduled closing date upon notice from debtor of closing date.

WHEREFORE, Nationstar Mortgage LLC d/b/a Mr. Cooper respectfully requests that the Debtor's Notice of Proposed Private Sale be denied; or in the alternative, requests the provisions presented in this Objection be incorporated in the Order resulting from the Debtor's Motion to Sell.

LOGS LEGAL GROUP LLP

Dated: 10-15-2021

By: /s/Elizabeth L. Wassall  
Elizabeth L. Wassall, Esq.

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In Re:

JOHN CHISHOLM,  
DEBTOR

Case No.: 19-12782-MBK

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KAPLAN

Chapter: 13

**CERTIFICATION OF SERVICE**

I, Linda Wright the undersigned

1. ☐ represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On 10/15/2021, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Response to Motion to Sell Real Property

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 10/15/2021

/s/ Linda Wright

Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
George E. Veitengruber, III, Veitengruber Law LLC 1720 Highway 34 Suite 10 Wall, NJ 07727		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
John Chisholm 738 Gail Drive Neptune, NJ 07753		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.



**LOGS Legal Group LLP**  
Attorneys at Law

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Mount Laurel, New Jersey 08054  
Tel: (856) 793-3080 • Fax: (847) 627-8809

**Partners**

Gerald M. Shapiro (licensed in FL, IL)  
David S. Kreisman (licensed in IL)

**Managing Partner**

Christopher A. DeNardo (licensed in NJ, NY, PA)

October 14, 2021

United States Bankruptcy Court  
Clarkson S. Fisher US Courthouse  
402 East State Street  
Trenton, NJ 08608

In Re: John Chisholm, Debtor  
Case No: 19-12782-MBK  
Chapter: 13  
Secured Creditor: Nationstar Mortgage LLC d/b/a Mr. Cooper  
Our file number: 19-025213

Dear Court Clerk:

Enclosed please find Response to Motion to Sell.

Thank you for your attention.

Very truly yours,  
LOGS Legal Group LLP

By: /s/Elizabeth L. Wassall  
Kathleen M. Magoon - 040682010  
Elizabeth L. Wassall - 023211995

Enclosures

cc: George E. Veitengruber, III, Debtor's Attorney  
Albert Russo, Standing Chapter 13 Trustee, Trustee  
John Chisholm  
738 Gail Drive  
Neptune, NJ 07753